

FILED  
JUN 3 - 2025  
CLERK'S OFFICE  
DETROITUNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISIONDERRICK LEE CARDELLO-SMITH, #267009,  
Petitioner,

Vs

Case No 2:25-cv-10754  
Honorable Mark GoldsmithSEAN COMBS, et al,  
Respondents,  
\_\_\_\_\_ /MOTION FOR DISCOVERY  
& ORDER GRANTING DISCOVERY

Plaintiff, Cardello-Smith, hereby moves this to enter an order GRANTING DISCOVERY to be provided by the Respondents to the Petitioner and that either the respondents or the Respondents Attorney of Record, Produce the Discovery this Petitioner is seeking, and states the following documents, records and materials should be provided to the Petitioner immediately:

1. ALL CRIMINAL FILE RECORDS HELD BY RESPONDENT KYM WORTHY ON THE PETITIONER, DERRICK LEE CARDELLO-SMITH
2. ALL SEXUAL ASSAULT CRIMES REPORTS, NOTES, DOCUMENTS, EVIDENCE AND MATERIALS HELD BY THE RESPONDENT KYM WORTHY, WAYNE COUNTY PROSECUTOR ON PETITIONER DERRICK LEE CARDELLO-SMITH FROM 1997 THROUGH 2025.
3. ALL MATERIALS, NOTES, PHONE RECORDS, DOCUMENTS, WITNESSES, REPORTS, POLICE RECORDS, MEDICAL RECORDS RELATED TO THE 1997 DEATH OF CARL BISHOP.
4. ALL CORONERS REPORTS RELATED TO THE DEATH OF CARL BISHOP AND ULTIMATE 1997 CHARGES OF SECOND-DEGREE MURDER UPON PETITIONER, DERRICK LEE CARDELLO-SMITH HELD BY THE RESPONDENTS.
5. ALL NOTES, RECORDS, MATERIALS, PHONE CALLS, PHONE RECORDS, EMAILS AND OTHER MATERIALS HELD BY RESPONDENT PATRICIA PENMAN OF THE WAYNE COUNTY PROSECUTORS OFFICE AND DETECTIVE OF THE DEARBORN POLICE DEPARTMENT.
6. ALL RECORDS, NOTES, DOCUMENTS AND MATERIALS HELD BY THE DETROIT POLICE DEPARTMENTS OFFICER NICOLE RABIOR FROM 1997 THROUGH 2019.
7. Copies of all Emails received by the Respondents from Any Staff Member, employee or agent of the Michigan Department of Corrections from January 1, 2024 through June 1, 2025.
8. Copies of all Emails received by the Respondents from Any Staff Member, employee or agent of the Michigan Department of of Attorney General's Office from January 1, 2024 through June 1, 2025.

9. All records, notes and documents held by the Respondents Lawyers, Kristoffer Butler, David Fink, Fink Bressack.

These documents are needed and necessary for the purposes of the Petitioner pursuing further postconviction relief that is not available to the petitioner in anyway.

Petitioner has already served Subpoenas upon the Respondents and provided them the required 30 days to produce these documents and the date of production or to file any answer has been ignored, refused or just plain refused to cooperate with this Petitioners Commands to produce the required documents and that time limit expired on May 25, 2025, resulting in this action being provided to this court.

**RELIEF SOUGHT**

Wherefore, Petitioner prays this court will enter an order to GRANT the Production of said discovery by the respondents and that this court will issue said order respectively and grant any further relief this court deems necessary and appropriate.

Respectfully Yours,



Derrick Lee Cardello-Smith

#267009

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NAME: \_\_\_\_\_  
Number: \_\_\_\_\_  
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Address: \_\_\_\_\_

Derrick Lee Cardello-Smith

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